From: Hathaway, Margaret

To: Nesci, Kimberly; Becker, Jonathan; Chism, William; Kaul, Monisha; Kells, Bradley; Kiely, Timothy; Orlowski, John;

Tindall, Kelly; Wyatt, TJ

Cc: Matuszko, Jan; Schmid, Emily; Crawford, Lydia; Meadows, Sarah; Kenny, Daniel; Rosenblatt, Daniel; Echeverria,

Marietta; Corbin, Mark; Farruggia, Frank; Harwood, Douglas (Ethan); Odenkirchen, Edward; Peck, Charles;

Wagman, Michael; Wait, Monica

Subject: FW: Additional cost for pH buffering agent and DRA?

Date: Wednesday, October 07, 2020 9:35:40 AM

Attachments: image005.png

image001.png image002.png

Good morning, BEAD:

Hot off the presses, BASF just sent in the information below regarding a summary of cost impacts anticipated from pH buffering agent and DRA use with dicamba OTT applications.

This should likely be rolled into BEAD's impacts assessment work.

Meg

From: Jeffrey H Birk <jeffrey.birk@basf.com> **Sent:** Wednesday, October 07, 2020 9:31 AM **To:** Kenny, Daniel <Kenny.Dan@epa.gov>

Cc: Hathaway, Margaret < Hathaway. Margaret@epa.gov>; Echeverria, Marietta

<Echeverria.Marietta@epa.gov>; John Sedivy <john.sedivy@basf.com>

Subject: Additional cost for pH buffering agent and DRA?

Hello Dan,

EPA has asked BASF to provide a summary of cost impacts to the grower for the addition of an approved pH Buffering Agent (PBA) and Drift Reduction Agent (DRA) to the Engenia® Herbicide (Dicamba OTT) application. The following two charts capture the average estimated Grower costs per acre that BASF expects the Grower to incur when utilizing these inputs. The following captures the expected base herbicide cost (Engenia® at labeled rate) and the incremental cost to add the PBA & DRA to a Grower applied herbicide treatment for the period 11/1/2020-11/1/2021.

PBA (SentrisTM Buffering Technology)

You will note that BASF's SentrisTM PBA has an incremental cost of \$1 per acre to the Grower. This is a 10% cost increase to the Grower.

DRA (Various, but must be qualified on product website)

The Grower cost of a DRA is estimated at \$1 - \$2 per acre. Therefore the DRA is an additional cost (to Engenia® Herbicide + SentrisTM PBA) of 10% - 20% when applied by the Grower.

Average Gr	ower Costs	
per Acre		
Engenia⊚	\$10	
Sentris [™] (PBA)	\$1	
DRA*	\$1-\$2	

Cost Impact to Grower per Acre			
Input	Cost Range	Percent Increase	
Herbicide (Engenia®)	\$10.00		
+ Sentris ^{TV} (PBA)	\$11.00	10%	
+ Sentris TM + DRA	\$11.50 \$12.50	20% 30%	

^{*} Average estimated Costs

JEFFREY BIRK

Product Registration Manager

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